



**Before the
DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY OF TRANSPORTATION
Washington, D.C. 20590**

In the Matter of

Transparency of Airline Ancillary Fees
And Other Consumer Protection Issues

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Docket No. DOT-OST-2014-0056

**COMMENTS OF
BUSINESS TRAVEL COALITION**

September 29, 2014

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I. INTRODUCTION

Business Travel Coalition (BTC) welcomes the opportunity to comment on this U.S. Department of Transportation (DOT) Notice of Proposed Rulemaking (NPRM). BTC further appreciates the accomplishments of DOT in the area of protecting air travel consumers against unfair and deceptive airline practices, particularly with respect to full-price advertising and disclosure of airline ancillary fees (e.g., checked baggage). DOT's role and responsibility to police airlines' anti-consumer policies and practices has become orders of magnitude more important in recent years. This NPRM is best analyzed against a new airline industry backdrop.

II. A RADICALLY CHANGED AIRLINE INDUSTRY

As the U.S. airline industry has consolidated to just 3 mega network carriers, those airlines have to worry far less about customers' needs and concerns. Airlines know that the customer has dramatically fewer airline choices than in past years. Importantly, because of the federal preemption doctrine in the Airline Deregulation Act of 1978, consumers have no private right of action at the state or federal levels if harmed by airlines. Furthermore, state consumer protection statutes do not apply to airline passengers and the Federal Trade Commission has no authority in this industry.

Price transparency is vitally important for the competitive process to function properly. However, airline industry consolidation has been accompanied by carriers aggressively unbundling their products charging fees for services previously included and paid for by consumers in the price of their tickets. While unbundling is

generally pro-competitive, it is unlikely to be beneficial without transparency in prices that is typically intended to accompany it. Indeed, airlines have been increasingly able – without competitive repercussions – to ignore the demand for ancillary fee data even from their largest, most sophisticated corporate, university and government customers. Moreover, airlines have inadequately responded to the concerns of Congress and DOT over lack of transparency and transactability of ancillary fees.

In eschewing true price transparency, airlines increasingly mask the all-in price of air travel, with two major adverse effects. First, lack of price transparency prevents consumers from efficient comparison-shopping of air travel offerings across multiple airlines – a hallmark of U.S. airline industry deregulation. A second consequence of the deterioration in price disclosure is that ancillary fees go largely undisciplined by market forces. Likewise, base fares are today not exposed to the full discipline of the marketplace and represent unreliable comparative benchmarks for consumers and regulators alike because some fares contain specific services that others do not. Arguably, to the extent that airlines are in a commodity business, it is to their advantage to attempt to differentiate themselves by making meaningful price comparisons difficult.

As airlines have grown larger and more powerful relative to consumers through consolidation, they have increasingly been able to refuse to provide consumers with ancillary services and associated fee information. This supports the notion that rivalry creates incentives for sellers to fully inform consumers about the pricing,

quality and availability of their products. Conversely, the loss of competition through airline industry consolidation has diminished those incentives. With fewer players in the market, the need for sellers to reach agreement on matters such as how to deal with baggage fees is minimized because it can be handled by the airlines “tacitly.”

The most pernicious effects of such radical consolidation may not be the most easily observable ones, e.g., higher prices. Airlines seem emboldened to reduce transparency, undermine DOT’s consumer-protection and Open Skies authorities and erect a fence around the U.S. to frustrate new entry by foreign carriers.

Indeed, airlines’ newfound monopsony power is being projected not in the traditional practice against supply chain participants, but rather against DOT, their regulator.

Examples include:

1 - drafting H.R. 4156, the Transparent Airfares Act of 2014, to reduce fare transparency and undermine DOT’s consumer protection authority;

2 - blocking Norwegian Airlines International’s application to provide new low-cost services to the U.S. by seeking to intimidate DOT and seeking Congressional intervention to block foreign carrier new entry;

3 - frustrating Middle Eastern carriers by restricting efficient access to U.S. markets;

4 - fighting to eliminate the Ex-Im Bank to keep modern new Boeing planes out of the fleets of foreign carriers that would introduce new services to the U.S.; and

5 – endeavoring, it would appear, to intimidate DOT in an August 2014 meeting comprising some fourteen airline lawyers concerning this very rulemaking.

Consumers need strong protections more than ever so long as all such protections are consolidated at the DOT, unlike all other industries where consumers can sue companies for damages or State Attorneys General can intervene on behalf of their citizens.

III. NOW IS THE TIME TO ISSUE THE ANCILLARY FEE RULE

DOT issued the first of recent airline passenger protection rules in December 2009 and a second one in April 2011. On May 21, 2014 DOT published a new NPRM regarding consumer protections. BTC has analyzed that NPRM and has concluded that the long awaited rule on the transparency / transactability of ancillary fees, which is one of many proposals within the NPRM, is at significant risk of being delayed deep into 2015, or even halted indefinitely.

The reason for concern is that on balance the numerous other proposals in the NPRM are fraught with inconsistencies and contradictions and have not been vetted very well, it would appear. DOT is likely to receive an avalanche of comments, analyses and studies during this NPRM process that will take it considerable time to work through if it wants to get the proposals right. Moreover, DOT needs to ensure

that the package as a whole is coherent bearing in mind that the agency knows airlines will most likely take them to court once the rule is published as they did with the April 2011 consumer protection rule.

As such, BTC and consumer groups are encouraging DOT to move forward promptly with the ancillary fee rule and to take the time necessary to consider the newly raised and unvetted possible rules on other topics (**see Addendum I**). DOT has indeed proceeded that way in the past. The ancillary fee issue was included in the April 2011 rulemaking. However, DOT ultimately decided it needed more time and analysis and, as such, chose to include the fees issue in the current rulemaking process ensuring that it was exhaustively analyzed.

Consumers lost the ability to comparison-shop the total price of air travel options since airlines began aggressively unbundling their products in 2008. DOT and the Office of Management and Budget have examined the ancillary fees issue with all manner of industry and consumer group input for more than 1,000 days. Travel industry participants want true comparison-shopping for consumers restored as soon as possible.

A recently concluded BTC survey of 343 corporate, university and government travel managers, travel management company executives and other industry professionals found that:

- 331, or 96.5 percent of survey participants think airlines should proactively provide ancillary fee information to channels where they sell their base fares;
- 325, or 94.75 percent of participants believe that because the marketplace after 6 years has not fixed this problem, DOT should issue a rule requiring airlines to provide this information to channels where they sell their base fares; and
- 304, or 90.48 percent believe DOT should require ancillary fee information to be shared by airlines in a format that allows the purchase of such services in the same transaction as the ticket purchase (**see Addendum II**).

The DOT proposal within the NPRM on ancillary services and associated fees is thoughtfully presented. However, there are significant gaps in the proposal that could leave consumers at risk of continued unfair and deceptive practices by airlines in pricing, marketing and selling those services. Following is analysis and recommended changes in response to DOT's ancillary fee proposal.

IV. CHANGES TO PROPOSED ANCILLARY FEE RULE

Consumers should be able to see, compare and purchase basic ancillary services through all of the distribution channels that airlines have opted to use. We thus favor the critically important DOT proposal that an airline be required to provide ancillary fee data to ticket agents who are authorized to sell travel services on behalf of an airline.

However, that core proposal needs to be accompanied by certain other elements in order to fully serve the interests of airline consumers. The three most critical elements that need to be incorporated into any final rule are outlined below.

Three Critical Changes to Proposed Rule:

- 1) The rule should include a requirement that fee data provided to ticket agents be transactable.**

Rationale: To airline consumers, transparency and transactability are interlocked, and consumers should be able to buy basic ancillary services during the ticket purchase process. A rule that does not require airlines to enable consumers to purchase basic ancillary services (i.e., transactability) would not resolve the problems that confront airline consumers (**see Addendum III**).

Without transactability, prices for ancillary services would change and specific seats, for example, might no longer be available when a customer attempts to purchase them, undermining the principle of transparency.

Airlines now change prices for ancillary services like seat assignments on a dynamic - potentially minute-by-minute - basis, so that a price presented to a traveler or travel agent during the search process may not be the same price later charged for that service, unless the ancillary service can be purchased along with the ticket.

As a result, there is a strong potential for bait-and-switch pricing when travelers are offered low prices during the search process, then charged higher ones when they try to complete the transaction, particularly after a traveler has been locked into a non-refundable ticket. In addition, desired seats, such as four adjoining seats for a family, may have disappeared when a consumer tries to buy them later.

Without transactability, ancillary service bookings would be more confusing, time consuming, complicated and counterintuitive as consumers or their agents are forced to take multiple additional steps to purchase a core component of their flight, only to see prices rise or inventory disappear when they attempt to do so.

Solution: The rule should require airlines to make all of the basic ancillary services that they offer transactable at the time of ticket purchase through the distribution channels they choose to use. Some airlines already make a limited portion of their ancillary services transactable today through ticket agents, so there is no technical limitation preventing it. Ancillary fees are transacted smoothly and efficiently through existing industry protocols and technical standards.

2) The rule should require airlines to share information on ancillary services with all ticket agents they have opted to use, including GDSs (i.e. “Option A”).

Rationale: Requiring disclosure of ancillary service fees to ticket agents that sell directly to consumers but not global distribution systems (GDS) (i.e. “Option B” in the NPRM) is not a viable option. There is no usable, workable mechanism by which airlines can electronically disseminate their ancillary service information to tens of thousands of individual travel agents other than the GDS networks, and most travel agents depend on the GDSs for nearly all of their pricing information.

GDSs have had the proven and tested capability to receive and efficiently disseminate this information to travel agencies since late 2010. The rule should utilize that capability to ensure that ancillary fee information can be disseminated through all of the channels that airlines and consumers use.

Solution: The rule should combine Option A with transactability to ensure that travelers are able to see, compare and purchase the ancillary services they need through any available distribution channel in which the airline offers its services.

3) The rule should include boarding and change/cancel fees as basic ancillary services, as well as any ancillary bundles offered, not just checked and carry-on baggage and paid-for seat reservations.

Rationale: Airlines made the strategic business decision to break apart the base ticket price into its component parts, including boarding, seating and baggage, thus depriving consumers of the ability to readily compare all-in pricing. This rule

should address that consumer harm by making all of the original components of the ticket price subject to the rule. As baggage and seat fees are already covered in the proposed rule, any fees for boarding also should be covered.

Change/cancel fees are already transparent – and generally transactable – and this rule should codify that protection. Ancillary bundles (that is, combining two or more basic services with or without other services not covered by the DOT rule, for example, Wi-Fi services bundled with a seat) should also be covered, or those bundles may be used as a way to avoid the requirements of the rule.

Solution: The proposed rule should be expanded to include fees for boarding and change/cancel fees as “basic ancillary services” under the disclosure and transactability requirements. The rule should also require that airlines must treat ancillary bundles as “basic ancillary services” covered by the rule if they include any of the covered ancillary services.

V. CONCLUSION

We appreciate the opportunity to comment on this important rulemaking. The consumer has waited some 6 years to have true comparison-shopping restored. Every day that goes by consumers are financially harmed by misleading practices and supra high fees for ancillary services as those fees go undisciplined by the marketplace. We urge DOT to deal with the ancillary fee rule right away and not permit this, the most important part of the rulemaking, to be

delayed by the long period of time likely to be required to analyze the great number of other complex and controversial proposals within the NPRM.

Respectfully Submitted,
Kevin P. Mitchell
Chairman and Founder
Business Travel Coalition

Addendum I

September 11, 2014

The Honorable Anthony Foxx
Secretary
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

Regarding DOT-OST-2014-0056-0079

Dear Secretary Foxx,

We consumer groups are writing to you to urge the Department to focus on what we consider the core issue in the current airline consumer protections NPRM - the consumer's ability to see, compare and buy ancillary fees. Consumers do not want to see this issue delayed again should other portions of the complicated NPRM require more study and analysis.

A robust docket shows that American consumers need and demand price transparency, the ability to comparison shop increasingly complex airline tickets along with fees for ancillary services and the ability to purchase those services wherever airlines choose to sell their tickets.

The solution is simple. The DOT's final rule should ensure that:

- Airline consumers can see the full cost of flying including basic ancillary fees.
- Airline consumers are able to comparison shop across airlines including passenger and flight specific ancillary fees.
- Airline consumers are able to purchase these ancillary products at the same time that they pay for their airfares.

The free market works only when prices are transparent, and consumers have waited long enough. As you know, the debate on this issue has been exhaustive.

- More than three years of industry studies, government analyses and economic papers.
- Detailed congressional hearings and meetings of the DOT Advisory Committee for Aviation Consumer Protection.
- Newspaper editorials.

- Hundreds of pages of rulemaking comments.
- Tens of thousands of consumer signatures.
- An extraordinary year-long review by the Office of Management and Budget.

We urge DOT to move expeditiously to ensure that ancillary fees are disclosed, searchable and transactable. Consumers have already waited more than three years for this issue to be addressed; we cannot risk further delay.

Over recent years airlines have made their ancillary fees increasingly complex. Some airlines are even moving to dynamic, real-time pricing for things like carry-on and checked-baggage fees and seat reservations fees. Those airline actions to shroud ancillary fees during the purchasing process have made the buying process unfair and deceptive for consumers attempting to purchase the services they will need on their flights.

Our organizations are thrilled that DOT has finally, after more than a thousand days, published this rulemaking. Now, we urge the Department to complete its rulemaking with robust requirements for the disclosure and transactability of ancillary fees.

Given the complexity of this rulemaking, consumer groups will understand should DOT require additional time to reflect on the new and important issues that have been added to this rulemaking such as a new definition of what constitutes a travel agent, expanding the pool of airlines reporting operation statistics, customer service plans from ticket agents, transparency of codeshare operations, disclosures of marketed carriers by online travel agencies and screen bias displays. If so, the DOT could follow its precedent with ancillary fees in the last consumer protection rule and request additional comments on any or all of those topics.

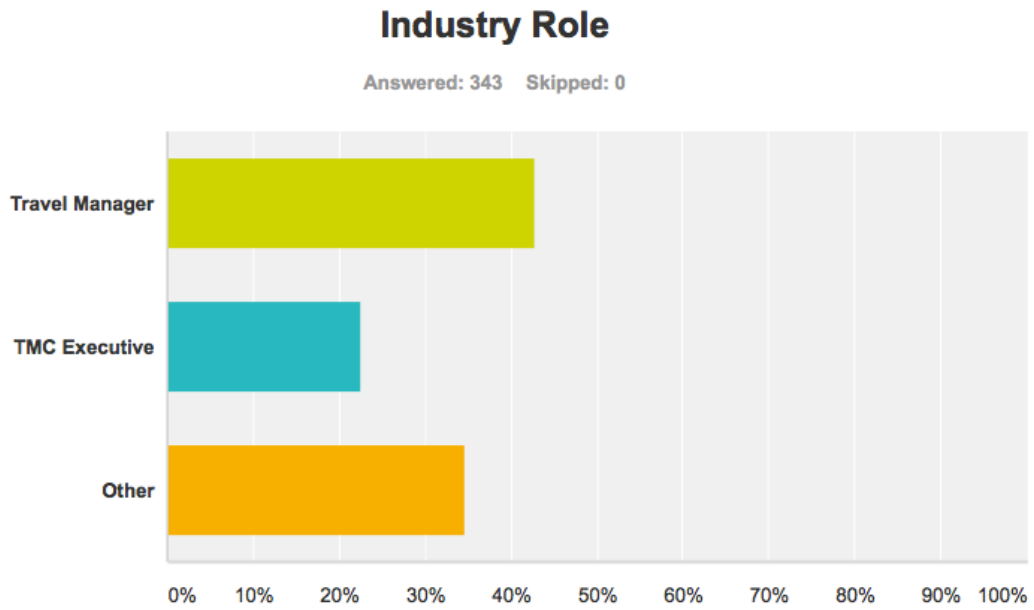
We urge you not to allow the complexity and scope of this NPRM delay the relief consumers have so desperately needed for the last six years since airlines begun aggressively unbundling their products. Consumers have waited long enough to know the full cost of airline travel.

Sincerely,

Consumer Federation of America
National Consumers League
Consumer Watchdog
Travelers United
Association for Airline Passenger Rights
Airline Passengers.org
Business Travel Coalition
PlusInc
Ed Perkins, Retired Founding Editor, Consumer Reports Travel Letter

Addendum II

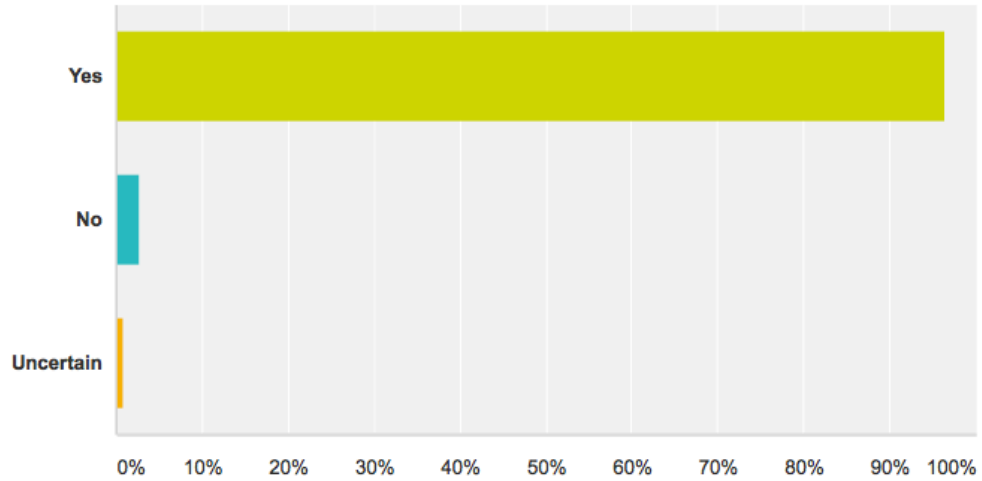
Travel Industry Survey Regarding Ancillary Fees Closed September 22, 2014



Answer Choices	Responses
▼ Travel Manager	42.86% 147
▼ TMC Executive	22.45% 77
▼ Other	34.69% 119
Total	343

Do you think airlines should proactively provide ancillary fee information to channels where they sell their base fares?

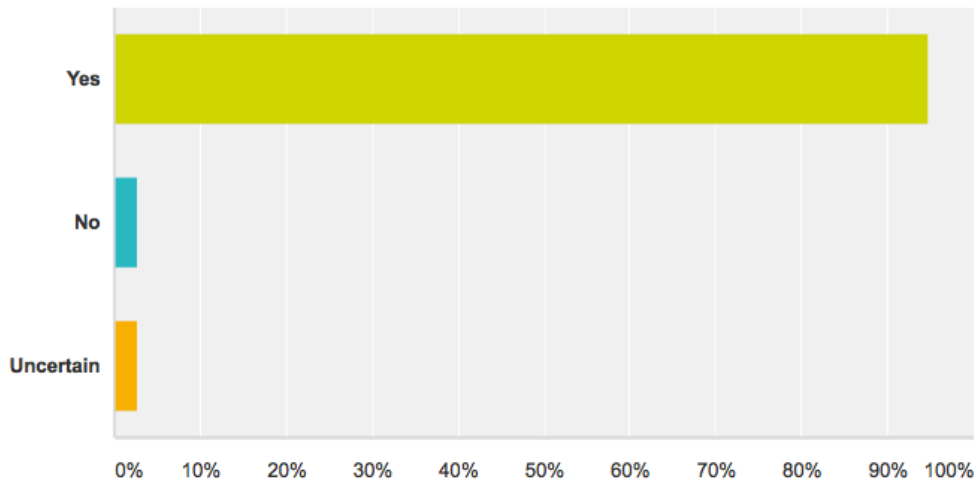
Answered: 343 Skipped: 0



Answer Choices	Responses
Yes	96.50% 331
No	2.62% 9
Uncertain	0.87% 3
Total	343

As the marketplace after 6 years has not fixed this problem, should the U.S. DOT issue a rule requiring airlines to provide this information to channels where they sell their base fares?

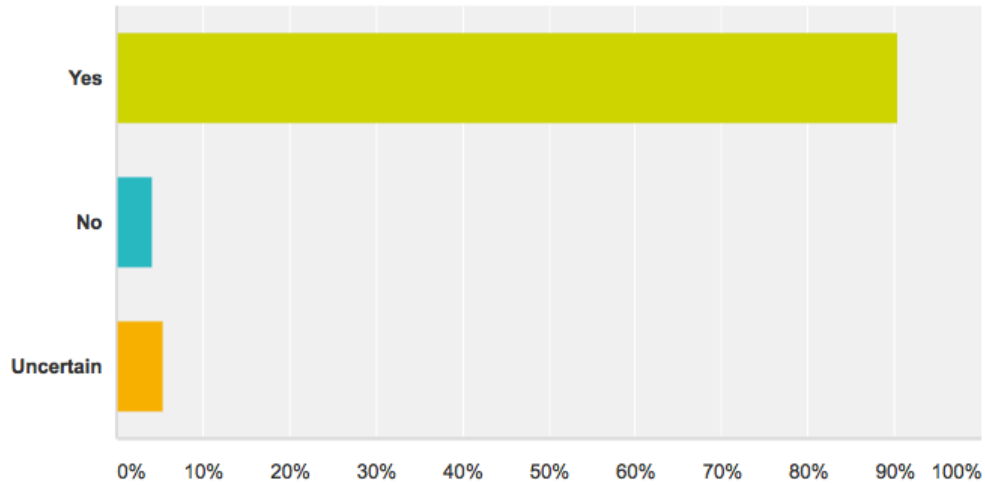
Answered: 343 Skipped: 0



Answer Choices	Responses
Yes	94.75% 325
No	2.62% 9
Uncertain	2.62% 9
Total	343

If yes, should the U.S. DOT require ancillary fee information to be shared in a format that allows the purchase of such services in the same transaction as the ticket purchase?

Answered: 336 Skipped: 7



Answer Choices	Responses
Yes	90.48% 304
No	4.17% 14
Uncertain	5.36% 18
Total	336

SURVEY PARTICIPANTS

- U.S. General Services Administration (GSA)
- U.S. Federal Aviation Administration (FAA)
- U.S. Marine Corps Headquarters
- The Port Authority of NY & NJ
- State Travel Managers Alliance (STMA)
- Guild of Travel Management Companies (GTMC)
- Finnish Business Travel Association
- Association for Airline Passenger Rights
- Association of Blind Citizens
- Travelers United
- Financial Industry Regulatory Authority (FINRA)
- Institute of Nuclear Power Operations
- David & Lucile Packard Foundation

W.K. Kellogg Foundation
Catholic Health Association
American Academy of Ophthalmology
American Dental Association
Teachers Insurance and Annuity Association
SmarterTravel.com
Ad Hoc Committee
Mercedes-Benz USA, LLC
GlaxoSmithKline
ConocoPhillips
CIGNA
Cargill
Sapient
Pfizer, Inc.
Philips NA
Whirlpool Corporation
Kellogg
CAMPBELL SOUP COMPANY
Gartner
New York Life Insurance
The Travelers Companies, Inc.
AOL
Cisco Systems
Dell Software Group
Wells Fargo
Gap, Inc.
Nike, Inc.
HealthCare California
Cannon Design
DOLLAR TREE
Marsh & McLennan
MOOG, Inc.
The Schwan Food Company
Yale University
The George Washington University
University of California, Los Angeles
Embry-Riddle Aeronautical University
University of North Carolina Wilmington
University of Washington
The University of Texas at Austin
John Carroll University
University Of Delaware
Michigan Technological University
University of Missouri
MD Anderson Cancer Center
Seneca College
Airlines Reporting Corporation (ARC)

Low-Fare & Regional Airlines
iJET
AirPlus International
Concur Technologies
InterContinental Hotels Group Plc
NWA Regional Airport
Budget Rent a Car
Cornerstone Information Systems
Denver International Airport
Corporate Travel Buyer Resources
Hickory Global Partners
Travel and Transport
BCD Travel
Maritz Travel Company
The Travel Company Edinburgh
World Travel, Inc.
Balboa Travel, Inc.
Valerie Wilson Travel, Inc.
UNIGLOBE Travel
TravelStore
Travel Leaders
The Travel Team, Inc.
Short's Travel Management
Omega World Travel
Ovation Corporate Travel/The Lawyers Travel
Bio-Rad Laboratories, Inc.
Dart Container
Unum
Turner International LLC
FC USA, Inc.
Enable Healthcare
LDS Church Travel
HCA Healthcare
HCC Insurance Holdings, Inc.
Tech Data Corp
Scotts Miracle-Gro
Rockwell Automation
Purcell Systems, Inc.
OSI Systems
National Instruments
Navistar, Inc.
CH2M HILL
NOVA Chemicals
Novo Nordisk Inc.
MICROS Systems, Inc.
Accent Travel Int'l
Acendas - Travel Management Company

AchieveGlobal
Advent Travel Leaders
Aladdin Travel
ALASKA TRAVEL SOURCE
Alexander Shreders Consulting
All Travel
Almeda Travel
Anon
Anthony Travel
Antietam Travel Service, Inc.
Atlas Travel
ATPI - Advanced Travel Partners International
AutoNation, Inc.
Avia Marketing Consultants Inc
Aviation Innovation
Axcelis Technologies
Berger Travel Agency Inc
Blackboard, Inc.
BMC Software, Inc
BRW Negócios & Turismo
Burlington Coat Factory
BYU Idaho Travel Office
AVID
Cadence Design Systems
CAE, Inc.
Caraway Travel Inc.
CHC Helicopter
CI Travel
CLG Travel Management
Colpitts World Travel
Colwick Travel
Corbin Ball Associates
Corniche Travel Group
Corporate Travel Management
Covington Travel
Cresta World Travel
Crowne Plaza LX
Discount Travel
Eaton
Egencia
El Sol Travel inc
Employee Travel Specials
Enterprise Holdings Inc.
Eton Travel
FANUC America Corporation
Far Horizons Travel, LTD.
Fives, Inc.

FreemanWhite
Fresenius Medical Care NA
Friendly Travel, Inc.
Gemini Travel
Geraci Travel
Get-A-Way Travel
GKR Consulting, LLC.
Global, Inc.
Global Travel
Global Travel Management
GlobalPoint Travel Solutions
GRACY TRAVEL INTERNATIONAL
Haworth, Inc.
HMHF Travel Management Corporation
HNL Travel Associates
Hologic, Inc.
HNTB Corporation
Homewood Suites by Hilton Austin-South/Airport
Hospitality Technology Consulting
InterplX Expense Management
Jack Henry and Associates
JBS & Associates
John S Stow Consulting, LLC
Leggett & Platt, Incorporated
Lumbermens Merchandising Corp.
LXR Travel LLC
MacNair Travel Management / American Express
Makino, Inc.
Management Concepts
Mann Travels
MDDUS
MEDITECH
Metro Travel
Midwest Travel Consultants
Mondelez International
Montrose Travel
MSP Travel Group
MTD Products, Inc.
Océ-Technologies
Odigeo (Opodo ltd. GoVoyages, eDreams, Travellink
OKT Travel
Provisur Technologies, Inc.
Redfern Travel
S.R. Travel
Sabre
SANDITZ TRAVEL
Skanska USA Building

Tribune Content Agency
Spokane Airport Ramada
Sportscorp Travel
State Street Corporation
Stepan Company
Stoel Rives
Sullivan & Cromwell LLP
Summit Travel Group
Sun Travel, Inc
Sunflower Travel
Teplis Travel
The Expedition Development Company
The Travel Group
Transocean
Travel Concepts
Travel Inc.
Travel Landing USA
Travel Leaders Indianapolis
Travel Leaders Rice Lake
Travel Management Partners, Inc.
Travel One, Inc.
Travel Pacific
Travelennium. Inc.
Traveline
Travelocity
Travelport
Travizon
Trimble Navigation
Uniglobe Accent Travel
Uniglobe Travel
Universal Travel / Accent Travel
Up and Away Travel
Utecht Diversified Event Resource, Inc.
Valencia Hotels, Inc
Valero Energy Corporation
Valley Services, Inc.
VIATUR TRAVEL SERVICES
VISA Tours & Travel [P] Ltd
Wallenius Wilhelmsen Logistics
Watlow
Webasto SE
White Lodging
Windgrove Ltd t/a Travel Bureau
Windows of the World Travel Ltd
WPP

Addendum III

September 29, 2014

The Honorable Anthony Foxx
Secretary
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

Regarding DOT-OST-2014-0056-0079

Dear Secretary Foxx,

We the undersigned corporate, university and government travel managers, travel management companies and other industry stakeholders write to applaud the U.S. Department of Transportation's (DOT) efforts to put in place airline consumer protections through the current Notice of Proposed Rulemaking (NPRM) concerning the multitude of so-called ancillary services for which airlines now charge separately. As major consumers and sellers of airline services, we are keenly interested in your transparency proposal to require airlines to provide ancillary fee data to ticket agents who are authorized to sell travel services on behalf of an airline. In fact, we think that airlines withholding this vital information on other fees and charges is inherently deceptive -- as it is tantamount to disclosing only a part of the all-in costs the consumer will pay to travel.

However, that core proposal also needs to require that the fee data be provided in a format that allows for the purchase of ancillary services in the same transaction as the base ticket. In the case of airline pricing, true transparency requires ancillary fee transactability because it is the sole enabler of efficient comparison-shopping of the total prices of travel alternatives. Consumers expect not just to be told the price of these add-on fees but to be able to buy them at the time when they commit to the purchase of a ticket so they can lock-in the prices they have been quoted. The rule should include a requirement that fee data provided to ticket agents be transactable.

The NPRM has many new complex DOT proposals. However, after three years of comments, studies and reviews by DOT and the Office of Management and Budget the ancillary-fee record is complete and the record on the other proposals is virtually non-existent. We are concerned that the ancillary-fee rule may well become entangled with a raft of knotty issues arising from the other proposals consequently pushing a decision deep into 2015, or even halting the process indefinitely. As such, we urge DOT to issue a final rule on ancillary fees as soon as possible and address the balance of the proposals at a later time.

We greatly appreciate your advocacy of the individual and organizational consumer of commercial air transportation services.

Sincerely,

Business Travel Coalition
Hickory Global Partners, LLC
Air Passengers Association of India
Spokane International Airport
Travel and Transport, Inc.
GlobalPoint Travel Solutions
World Travel, Inc.
Rich Products Corporation
HealthCare California
TravelStore
HelmsBriscoe
Flyers Rights
Oracle
VISA Tours & Travel [P] Ltd
The Travel Insider
A & I Travel Management, Inc.
Balboa Travel, Inc.
AVID
Joselyn, Tepper & Associates, Inc.
Colpitts World Travel
Travel-On, Ltd.
Travel Shoppe
Hidden Treasure Tours, Inc.
Roberta's Travel Solutions
LXR Travel LLC
Colwick Travel Corporation
John S Stow Consulting, LLC
Anthony Travel
Stephens, Inc.
BYU-Idaho
Teamsters Local 455
Geraci Travel
Universal Travel
Mikail J Khan, Esq.
Anthony Decorators
PSEG
Chateau Publishing
Gregory Lane Hunter, Attorney
Susan Smith Travel
JADA MANAGEMENT SYSTEMS, LLC
Mircalla Technology
Tzell Travell Group NW
CyberEdge Information Services
On Trek Student Travel

Sandy's Travel Services, Inc.
FoxWatch Inc.
Britt's Auto Sale
Dematic
Novustep LLC
Makino, Inc.
Arrowhead Asset Management
HBT Enterprises, LLC
Fenwick High School, Oak Park, IL.
International Consulting
Association of Blind Citizens
ELG Consulting
Transformation International LLC
MicroEdge, LLC
RFC COMPANY
L. K. Stevens
Rob Sullivan Productions
Redfern Travel
ADA Travel
HNL Travel Associates
Options Travel
Accent Travel
Accent Travel Austin
Saraswati Publications, LLC
OSI Systems, Inc.
Megatours